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April 10, 2020

VIA ECF

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Villella v. Chemical and Mining Company of Chile, Inc. et al.*, 15-cv-2106-ER

Dear Judge Ramos:

We represent Chemical and Mining Company of Chile, Inc. (a/k/a Sociedad Química y Minera de Chile S.A.) (“SQM”) in the above-captioned action. We write with respect to SQM’s forthcoming summary judgment motion, due on April 16, 2020 (*see* Dkt. No. 166). Specifically, SQM seeks leave to file a memorandum of law in support of its summary judgment motion of no more than 40 pages. SQM respectfully submits that this page extension is necessary to address the law and facts SQM believes the Court should consider in ruling on the motion.¹ Plaintiffs do not oppose SQM’s request, and SQM has no objection to Plaintiffs being afforded an equivalent page-limit extension for their opposition to SQM’s summary judgment motion.

As always, SQM is available to answer any questions Your Honor may have.

¹ To avoid burdensome duplication in SQM’s submissions, SQM’s *Daubert* motion, which will be filed concurrently with its summary judgment motion, will incorporate by reference, where possible, the relevant factual record outlined in the summary judgment motion and accompanying Local Civil Rule 56.1 statement of material undisputed facts.

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Respectfully submitted,

/s/ Grant R. Mainland

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cc: All Counsel of Record (via ECF)